



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION IX

WATER DIVISION  
Drinking Water Office (WTR-6)  
75 Hawthorne Street  
San Francisco, California 94105-3901  
FAX: (415) 947-3549

MEMORANDUM

**DATE:** August 25, 2011

**SUBJECT:** No-Cost Extension (to December 31, 2012) for a Hopi Drinking Water Grant  
Grant No. FS-98969501 – Villages of Moenkopi

**TO:** Vernese Gholson, Grants Management Office (MTS-7)

**FROM:** Bessie Lee, Drinking Water Office (WTR-6) *blue*

The purpose of this memorandum is to provide justification for a no-cost extension from September 30, 2011 to December 31, 2012 for the subject Drinking Water Tribal Set-Aside (DWTSA) grant from the U.S. Environmental Protection Agency (USEPA) to the Hopi Tribe. Attached is a letter dated August 15, 2011 from the Hopi Tribe requesting the no-cost grant extension.

In 2005, the Hopi Tribe requested that the subject grant end date be extended from December 31, 2005 to November 30, 2009. At that time, the scope of work for the project had to be revised when the water from the newly drilled source well for the Villages of Moenkopi was found to be of poor quality. Water from the new well needed to be treated by reverse osmosis (RO) in order to meet the secondary drinking water standards. However, water treatment was not part of the original scope of work. A draft revision of the work plan was prepared by the Hopi Tribe. As part of the work plan revision, new costs were developed. The revisions indicated that in order to complete the project, which now included treatment, an additional \$2 million of project funding was needed. Because USEPA could not fund such a huge shortfall, from 2006 to 2008, the Hopi Tribe pursued and applied for additional grant funding from other federal agencies. In early 2008, the Hopi Tribe was awarded an Indian Community Development Block Grant (ICDBG) from the U.S. Department of Housing and Urban Development (HUD) for approximately \$2.2 million. The ICDBG grant funds would be used to construct an RO treatment facility, brine waste disposal ponds, and distribution main.

During the time the Hopi Tribe was applying for additional grant funding, work on the design of the RO treatment facility, brine waste disposal ponds, and distribution main continued at a slower pace, using USEPA grant funds. This work also included project and construction management activities. Initial preparation of the specifications and bidding activities for the construction activities also took place, with these activities paid with USEPA grant funds.

In mid- to late-2009, water supply issues associated with the Upper Moenkopi water system had to be addressed (for example, a state of emergency was declared by Upper Moenkopi in

RECEIVED

AUG 29 2011

GMO, MTS-7

August/September 2009 when their storage tanks were almost drained). This caused a delay in getting the construction of the USEPA/HUD-funded drinking water project out to bid.

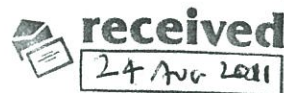
Construction of the distribution main was completed in September 2010. Construction of the RO treatment facility and brine waste disposal ponds was completed in February 2011. The RO system was started up in late February 2011. However, iron levels that affect the RO system were identified during the start-up activities. This resulted in a need for a pump test of the C-aquifer well. The 72-hour pump test was conducted in May 2011. The final report from the May 2011 pump test was completed in late July 2011. The recommendation from the pump test is to install a packer system down the C-aquifer well. However, since the packer system will cost about \$200,000, the Hopi Tribe identified in early August 2011 one other option to confirm that the RO system, as designed, can treat the iron levels in the C-aquifer well. This option, which is to run the water through two green sand filters (rather than one), will be implemented in September/October 2011. If the option is not able to fully address the iron issue, then the packer system would be installed. After installation of the packer system, another set of start-up activities would be initiated. Since the actual effectiveness of the RO system will not be known by September 30, 2011 and the possible need to install a packer system in the C-aquifer well, the end date of the DWTSA grant needs to be extended to December 31, 2012.

Even though in 2009 it was indicated that the no-cost extension of the subject grant to September 31, 2011 would provide adequate time to complete the project, it was not known at that time that the iron levels in the C-aquifer well may not be adequately treated by the RO system. The physical parts of the drinking water infrastructure project have been constructed. It is now a matter of getting the treatment system fully operational.

If you have any questions, please do not hesitate to contact me at (415) 972-3776.

cc: Clayton Honyumtewa, Natural Resources Department, Hopi Tribe  
Lionel Puhuyesva, Water Resources Program, Hopi Tribe  
Samuel Shingoitewa, General Manager, Moenkopi Utility Authority  
William Charley, Governor, Upper Moenkopi  
Marilyn Lomahaftewa, Community Services Administrator, Upper Moenkopi  
Lorena Naseyowma, Community Services Administrator, Lower Moenkopi  
Rick Rivers, Indian Health Service  
Marcus Felter, Indian Health Service  
Pete Mitchell, Indian Health Service  
Cristal Quinn, U.S. Department of Housing and Urban Development  
John Hamilton, Drinking Water Office, USEPA (WTR-6)





# THE HOPI TRIBE



**LeRoy N Shingoitewa**  
Chairman  
**Herman G Honanie**  
Vice Chairman

August 15, 2011

Bessie Lee  
US EPA, Region 9  
Drinking Water Office (WTR-6)  
75 Hawthorne Street  
San Francisco, CA 94105-3901

Dear Ms. Lee,

The Hopi Tribe is requesting an extension for U.S. Environmental Protection Agency Drinking Water Tribal Set-Aside Grant No. FS-98969501. The grant period is October 1, 2000 to September 30, 2011. We request to extend this period for one year which would amend the grant to October 1, 2000 to December 31, 2012. This would include any unexpended funds from the original budget \$1,259,000.00 that was allocated for this project.

The funding that was allocated has been used to address water quantity and water quality issues at the Village of Upper Moenkopi. The current water system has shown to be inadequate at times in supplying the demand for the Village of Upper Moenkopi and was in need of another water source to supplement the current Public Water System (PWS) now and into the future. To accomplish this new water well was drilled into the C-Aquifer to supply the needed water, however there were water quality issues associated with this well and required the establishment of a reverse osmosis water treatment facility to make this a viable source for the village.

To date a majority of the activities associated with the grant have been completed. These tasks include the following:

- Engineering and Design Completed for the project.
- The drilling of a new source well (2004)

- Construction of new water transmission lines(2010)
- Extension of power supply to reverse osmosis plant (2010)
- Construction of reverse osmosis treatment and brine waste disposal facilities (2010)

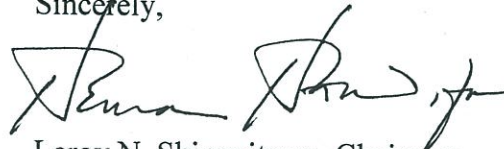
As with any construction project there is a period where adjustments need to be made with any infrastructure construction and additional work may need to be done in order to get the system to work at its optimum. With the completion of the new reverse osmosis plant there were some unanticipated technical issues that came up that needed further investigation some of these issues are as follows:

- Water quality changes in source water from C-Aquifer well resulted in higher TDS and Iron
- Further evaluation was needed to pin point the problem and find solutions
- Additional equipment and/or training may be needed to solve issues with the higher TDS and Iron

Due to the further investigations needed to clarify and find solutions to the higher TDS and Iron issues it has pushed back the project schedule and we are in need of an extension to complete the remaining work to commission the plant and train staff who will take over the plant for the village. We are asking for a one year extension and will put the project completion date to December 31, 2012. As with any construction activity on Hopi we must remain cognizant about the cultural aspects that we have to take into consideration. The time of year and types of ceremonials that may be taking place in the affected Village are all a part of this process. Due to this coordination that needs to take place between the Villages, the Tribal Government and the Contractors, there is an impact on the timeline of a project and we are taking all these issues into account in asking for this extension.

U.S. EPA and the Hopi Tribe are working with a common goal in mind and that is to have safe drinking water for all people wherever they might reside. Keeping that in mind we hope for a favorable response to our request. If you have any questions or need additional information, please contact my office at (928) 734-3101 or Mr. Lionel Puhuyesva, Director, Water Resources Program at 928-734-3711.

Sincerely,



Leroy N. Shingoitewa, Chairman  
The Hopi Tribe



**ENVIRONMENTAL PROTECTION AGENCY, REGION 9**  
**FY 2012 ULO Project Period Metric Review**

**Project Officer Name:** Bessie Lee

**Division Name:** Water Division

**Agreement Number:** FS-98969501

**Recipient Name:** Hopi Tribe

**Project Period Start Date:** October 1, 2000

**Project Period End Date:** December 31, 2012

I have reviewed the above referenced agreement as required by the FY 2012 Metric for Assistance Agreement Unliquidated Obligations for agreements with project periods of 7 years or more and have determined the following as a result of this review (select an appropriate determination):

\_\_\_\_ The project period should be shortened to [new end date]. The recipient expects to complete work sooner than was previously anticipated. I will work with the recipient to submit a project period change request to the Grants Management Office and will coordinate an amendment to the agreement with the Grants Management Specialist to be issued before September 30, 2012.

**X** The project period should remain the same. Work is progressing at an acceptable pace and the recipient's expenditures and draw downs are reasonable given the progress to date.

\_\_\_\_ The work is complete and the agreement will be closed before September 30, 2012. I will submit or I have submitted the Close-out Certification Memo to the Grants Management Office to recommend closeout of the agreement.

\_\_\_\_ The project period should be extended to [new end date]. Work is progressing, however, additional time is needed to complete remaining workplan tasks and expend the remaining balance of funds. I will work with the recipient to submit a no-cost time extension request to the Grants Management Office and will obtain the requisite waiver approval from the Office of Grants and Debarment and the Office of the Chief Financial Officer through the Region 9 Senior Resource Official. If the award is for a program covered by GPI 11-01, and was awarded prior to October 1, 2010, I will ensure that the rationale for extending the agreement is documented and is consistent with the standards stated in the OGD Director's February 3, 2012 memorandum to the Senior Resource Officials.

<http://r2notes3.r02.epa.gov/Intranet/iOPM-GCMB.nsf/0/A257E041C7D8A8DA8525788E00574B47>  
I will coordinate an extension amendment to the agreement with the Grants Management Specialist to be issued before September 30, 2012.

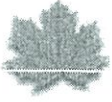
**Comments:**

As of May 21, 2012, \$28,745.34 remains in the grant. The majority of the tasks (e.g., construction of the new reverse osmosis treatment plant with associated waste brine ponds at Upper Moenkopi) have been completed. The remaining tasks (e.g., assist with completion of the start-up activities associated with the reverse osmosis plant) can be completed by the grant end date of December 31, 2012.

  
\_\_\_\_\_  
Signature

\_\_\_\_\_  
May 21, 2012  
Date





**Administrative Baseline Monitoring completed in IGMS for the Hopi Tribe,  
GRANT #FS98969501**

Vernese Gholson to: Bessie Lee

02/02/2011 09:44 AM

---

Hi Bessie.

This email serves as a notification that the administrative baseline monitoring information in IGMS for the Hopi Tribe, DRINKING WATER TRIBAL SET-ASIDE program grant has been entered. You can view the information in the Post Award Module of IGMS. Let me know if you have any questions.

Is the remaining balance of the award necessary to complete the project?

Vernese Gholson  
Grants Specialist  
U.S. Environmental Protection Agency (EPA)  
Grants Management Office (MTS-7)  
75 Hawthorne Street  
San Francisco, CA 94105  
Phone: (415) 947-4200  
Fax: (415) 947-3556  
Email: [gholson.vernese@epa.gov](mailto:gholson.vernese@epa.gov)  
<http://www.epa.gov/region9/funding/>










**Administrative Baseline Monitoring completed in IGMS for the Hopi Tribe,  
Grant No. FS-98969501-5**

Vernese Gholson to: Bessie Lee

Bcc: Vernese Gholson

02/02/2010 08:44 AM

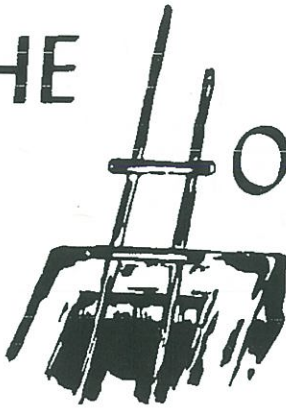
Hi Bessie. This is to notify you that I have completed the administrative baseline monitoring information in IGMS for the Hopi Tribe, Drinking Water Infrastructure Tribal Set-Aside Program - Moenkopi. You can view the information in the Post Award Module of IGMS. Instructions for completing programmatic baseline monitoring are included in the R9 Grants On-line Database -----> , click on Tools for Grants, Post-Award Management, PO Post-Award Monitoring Tools. Let me know if you have any questions.

Vernese Gholson  
Grants Specialist  
U.S. Environmental Protection Agency (EPA)  
Grants Management Office (MTS-7)  
75 Hawthorne Street  
San Francisco, CA 94105  
Phone: (415) 947-4200  
Fax: (415) 947-3556  
Email: [gholson.vernese@epa.gov](mailto:gholson.vernese@epa.gov)  
<http://www.epa.gov/region9/funding/>





# THE HOPI TRIBE



November 24, 2009

Ms. Bessie Lee  
U.S. Environmental Protection Agency, Region 9  
Drinking Water Office (WTR-6)  
75 Hawthorne Street  
San Francisco, California 94105-3901

RE: Moenkopi Drinking Water Infrastructure Grant, No. FS-98969501

Dear Ms. Lee,

The purpose of this letter is to request for a no-cost extension in regards to the Moenkopi Drinking Water Infrastructure Grant, No. FS-98969501.

By granting an extension would allow us to finalize an electrical service agreement and to complete the final engineering design. We ask that the project and budget deadline be adjusted from November 30, 2009 to September 30, 2011.

If you have any questions you may contact Ms. Sharon Masek Lopez, Water Resources Program at (928) 527-4242, extension 116 or she may be emailed at [aanu129@yahoo.com](mailto:aanu129@yahoo.com). Or you may contact Ms. Uberta Mowa by calling (928) 734-3713.

Sincerely,

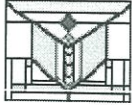
A handwritten signature in black ink, appearing to read 'Mary A. Felter', written over a horizontal line.

Mary A. Felter, Tribal Secretary/  
Acting Chief Executive Officer

Copy: Yvonne Day Contracts/Grants Administration  
File







**Justification for a No-Cost Extension of the DWTSA Grant for the Moenkopi Drinking Water Infrastructure Project (Grant No. FS-98969501)**

Bessie Lee to: Vernese Gholson

12/01/2009 02:20 PM

Cc: Corine Li, chonyumptewa, jpmason60, aanu129, UpperMoenkopi, hpole, Mike.Stover, peter.mitchell, cristal\_a.\_quinn, john.hamilton

Vernese,

Attached is a memorandum with a justification to extend the project/budget end date of the subject grant from November 30, 2009 to September 30, 2011. Please let me know if you need additional information.



12-1-09 No Cost Extension Justification - Moenkopi.pdf

~~~~~  
Bessie Lee  
~~~~~

U.S. Environmental Protection Agency, Region 9  
Drinking Water Office (WTR-6)  
75 Hawthorne Street  
San Francisco, California 94105-3901  
Phone: (415) 972-3776  
Fax: (415) 947-3549  
E-mail: lee.bessie@epa.gov

John Mason

Email: jpmason60@gmail.com

Phone# : 928-527 4242 X114

Leroy Shingotewa  
New Chairman







UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION IX

WATER DIVISION  
Drinking Water Office (WTR-6)  
75 Hawthorne Street  
San Francisco, California 94105-3901  
FAX: (415) 947-3549

MEMORANDUM

DATE: December 1, 2009

SUBJECT: No-Cost Extension (to September 30, 2011) for a Hopi Drinking Water Grant  
Grant No. FS-98969501 – Villages of Moenkopi

TO: Vernese Gholson, Grants Management Office (MTS-7)

FROM: Bessie Lee, Drinking Water Office (WTR-6) *nee*

CC: Clayton Honyumptewa, Natural Resources Department, Hopi Tribe  
Jon Mason, Water Resources Program, Hopi Tribe  
Sharon Masek Lopez, Water Resources Program, Hopi Tribe  
Charlene Naha, Community Services Administrator, Upper Moenkopi  
Harris Polelonema, Community Services Administrator, Lower Moenkopi  
Mike Stover, Indian Health Service  
Pete Mitchell, Indian Health Service  
Cristal Quinn, U.S. Department of Housing and Urban Development  
Corine Li, Drinking Water Office, USEPA (WTR-6)  
John Hamilton, Drinking Water Office, USEPA (WTR-6)

The purpose of this memorandum is to provide justification for a no-cost extension from November 30, 2009 to September 30, 2011 for the subject Drinking Water Tribal Set-Aside (DWTSAs) grant from the U.S. Environmental Protection Agency (USEPA). The last amendment for the subject grant was also a no-cost amendment. In 2005, the Hopi Tribe requested that the subject grant end date be extended from December 31, 2005 to November 30, 2009. At that time, the scope of work for the project had to be revised when the water from the newly drilled source well for the Villages of Moenkopi was found to be of poor quality. Water from the new well needed to be treated by reverse osmosis in order to meet the secondary drinking water standards. However, water treatment was not part of the original scope of work. A draft revision of the work plan was prepared by the Hopi Tribe. As part of the work plan revision, new costs were developed. The revisions indicated that in order to complete the project, which now included treatment, an additional \$2 million of project funding was needed. Because USEPA could not fund such a huge shortfall, from 2006 to 2008, the Hopi Tribe pursued and applied for additional grant funding from other federal agencies. In early 2008, the Hopi Tribe was awarded an Indian Community Development Block Grant (ICDBG) from the U.S. Department of Housing and Urban Development (HUD) for approximately \$2.2 million. The ICDBG grant funds will be used to construct a reverse osmosis treatment facility, brine waste disposal ponds, and distribution main.

During the time the Hopi Tribe was applying for additional grant funding, work on the design of the reverse osmosis treatment facility, brine waste disposal ponds, and distribution main continued at a slower pace, using USEPA grant funds. This work also included project and construction management activities. Initial preparation of the specifications and bidding activities for the construction activities also took place, with these activities paid with USEPA grant funds. It was decided by the Hopi Tribe that the design, specifications, and bidding documents for the treatment facility, disposal ponds, and distribution main could be completed and used at a later date if construction funding could not be identified.

In mid- to late-2009, water supply issues associated with the Upper Moenkopi water system had to be addressed (for example, a state of emergency was declared by Upper Moenkopi in August/September 2009 when their storage tanks were almost drained). This caused a delay in getting the construction of the USEPA/HUD-funded drinking water project out to bid. There continues to be water supply issues associated with activities being implemented by Upper Moenkopi. However, the Hopi Tribe has decided to not delay the USEPA/HUD-funded drinking water project and to put the construction activities out to bid.

Construction of the reverse osmosis treatment facility, brine waste disposal ponds, and the distribution main will be put out to bid in December 2009/January 2010. A contractor will be selected by the Hopi Tribe in January 2010. Construction activities are expected to be completed by the end of calendar year 2010. Start-up activities of the treatment facility are expected to take a number of months and should be completed in mid-2011. Because the treatment plant is not expected to be fully operational until 2011, there is a need to extend the end date of the DWTSA grant to 2011.

Even though in 2005 it was indicated that the no-cost extension of the subject grant to November 30, 2009 would provide adequate time to complete the project, it was not known at that time that the project would have a shortfall of approximately \$2 million. Since USEPA could not fund such a huge project cost shortfall, the Hopi Tribe needed to find other funding in order to complete the drinking water infrastructure project. This search for additional funding took two years of the project period.

The Hopi Tribe has just completed a re-evaluation of the project costs for the Moenkopi drinking water infrastructure project. There could potentially be an additional \$150,000 shortfall for the project. However, the Hopi Tribe will wait until the construction bidding process is complete to determine the actual shortfall. If the actual budget shortfall is up to \$150,000, DWTSA funding from USEPA could possibly be used to address the shortfall.

If you have any questions, please do not hesitate to contact me at (415) 972-3776.





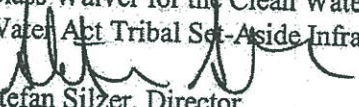
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

JUL 21 2008

OFFICE OF  
ADMINISTRATION  
AND RESOURCES  
MANAGEMENT

**MEMORANDUM**

**SUBJECT:** Class Waiver for the Clean Water Act Indian Set-Aside and the Safe Drinking Water Act Tribal Set-Aside Infrastructure Construction Programs

**FROM:**   
Stefan Silzer, Director  
National Policy, Training and Compliance Division  
Office of Grants and Debarment

**TO:** Sheila Frace, Office of Wastewater Management  
  
Steve Heare, Office of Ground Water and Drinking Water

I am responding to your request for a class waiver of the Guidance Principle 1 of the Interagency Guidance Policy Issuance IPI 08-02 and Grants Policy Issuance GPI 08-02: waiver from Interagency Agreement Policy Issuance (IPI) 08-02, Guidance on the Project Duration and the Use of New Awards for Interagency Agreements and Grants (effective February 29, 2008) for the Clean Water Act Indian Set-Aside and the Safe Drinking Water Act Tribal Set-Aside infrastructure construction programs awarded prior to February 29, 2008.

**Background**

IPI 08-02, Guidance on Project Period Duration and the Use of New Awards for Interagency Agreements, states the total of all of the project periods of an interagency agreement, including all amendments, may not exceed seven years unless there is a specific regulatory or statutory authorization for a longer project period or a signed waiver from the Director, Office of Grants and Debarment (OGD), or designee, granting an exception (e.g., a waiver for a Superfund Long Term Remedial Action). In response to a written request from the appropriate Senior Resource Official, the OGD Director, or designee, may approve waivers to the guidance on a class or individual basis because of national security concerns, circumstances of unusual or compelling urgency, unique programmatic considerations, or because the waiver would be in the public interest.

The Clean Water Act Indian Set-Aside and the Safe Drinking Water Act Tribal Set-Aside infrastructure construction programs are primarily administered through interagency agreements



with the Indian Health Service; however, some projects are funded through grants to tribes. The time required to plan, design, construct and verify the performance of the completed facilities frequently exceeds the seven (7) year project period limit identified in the Interagency and Grant Guidance Policy Issuances IPI 08-02 and IGI 08-02. As a result of being located on Tribal Reservations unique time intensive activities can often affect the completion of these projects.

As an OMB program measure the Indian Health Service has established an average project duration goal of less than the seven (7) year limit established in Interagency and Grant Guidance Policy Issuances IPI 08-02 and IGI 08-02 for all projects administered by the Indian Health Service and for grants to tribes. In order to achieve this measure, the Clean Water Act Indian Set-Aside and the Safe Drinking Water Act Tribal Set-Aside infrastructure construction programs, the tribes and the Indian Health Service are currently considering new processes and procedures to reduce the project periods. This waiver is for all interagency agreements and grants awarded prior February 29, 2008.

#### **NPM and OGC Recommendation**

The Office of Ground Water, Drinking Water and the Office of Wastewater Management and the Office of General Counsel recommend that the class waiver be approved.

#### **Action**

I have carefully reviewed the class waiver request and agree with the program's assessment that a seven year project period limit was not appropriate for these IAGs due to unique programmatic considerations. Accordingly, I am approving the request. This will waive the Guidance Principle 1 of the Interagency and Grant Guidance Policy Issuances IPI 08-02 and IGI 08-02: Guidance on the Project Duration and the Use of New Awards for Interagency Agreements and Grants (effective February 29 2008) for all interagency agreements and grants awarded prior to February 29, 2008 under the Clean Water Act Indian Set-Aside and the Safe Drinking Water Act Tribal Set-Aside infrastructure construction programs. The Regions will receive approval from the respective Assistant Regional Administrator for each interagency agreement and grant that this waiver is applied to.

cc: Howard Corcoran  
Lucille Liem  
Jeanne Conklin  
Ellen O'Boyle  
Barbara McDonough





Fw: Hopi Tribe grant (FS-98969501-5) expired, but being extended....

Vernese Gholson o Uberta Mowa

12/03/2009 08:38 AM

Cc. Bessie Lee

Hi Uberta.

The Tribe may receive a request from our LV Finance Center regarding the Final Financial Form. Please disregard the request as the agreement to extend the project and budget period to 09/30/2011 will be mailed to your office shortly.

Please feel free to contact me if you have any questions or concerns.

*Happy Holidays!*

Vernese Gholson  
Grants Specialist  
U.S. Environmental Protection Agency (EPA)  
Grants Management Office (MTS-7)  
75 Hawthorne Street  
San Francisco, CA 94105  
Phone: (415) 947-4200  
Fax: (415) 947-3556  
Email: [gholson.vernese@epa.gov](mailto:gholson.vernese@epa.gov)  
<http://www.epa.gov/region9/funding/>

----- Forwarded by Vernese Gholson/R9/USEPA/US on 12/03/2009 07:45 AM -----

**Document Summary:** General Ledger Entries

**Doc Type:** GO

**Doc No:** FS98969501

**Vendor Code:** 860134082A1

**IGMS Grant No:** 98969501-4

**IGMS Budget Start Date:** 10/01/2000

**IGMS Budget End Date:** 11/30/2009

**IGMS Project Start Date:** 10/01/2000

**IGMS Project End Date:** 11/30/2009

**Order Date:** 09/28/00

**Effective Date:** 10/01/00

**Closed Date:**

**Servicing Finance Office:** AP09

**Order Amount:** \$1,259,000.00

**Paid Amount:** \$711,806.38

**Available Amount:** \$547,193.62

**Vendor:** THE HOPI TRIBE

AIMS FFR Status: 12/02/2009-First letter requesting final FFR sent by LVFC

